

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SYMBOLOGY INNOVATIONS LLC
Plaintiff

v.

BRIGGS & STRATTON CORPORATION
Defendant

*
*
*
*
*
*
*
*
*

CIVIL ACTION NO. 3:17-cv-151

* * * * *

JOINT MOTION FOR DISMISSAL

Plaintiff Symbology Innovations LLC and Defendant Briggs & Stratton Corporation pursuant to Fed. R. Civ. P. 41 (a), hereby move for an order dismissing all claims by Plaintiff against Defendant with prejudice and counterclaims by Defendant against Plaintiff without prejudice, with each party to bear its own costs, expenses and attorney's fees.

RESPECTFULLY SUBMITTED.

Dated: August 9, 2017

By: /s/Eugenio J. Torres-Oyola
Eugenio J. Torres-Oyola
USDC No. 215505
Ferraiuoli LLC
221 Plaza, 5th Floor
221 Ponce de León Avenue
San Juan, PR 00917
Telephone: (787) 766-7000
Facsimile: (787) 766-7001
Email: etorres@ferraiuoli.com

Jean G. Vidal Font
USDC No. 227811
Ferraiuoli LLC
221 Plaza, 5th Floor
221 Ponce de León Avenue
San Juan, PR 00917
Telephone: (787) 766-7000

Facsimile: (787) 766-7001
Email: jvidal@ferraiuoli.com

Carlos R. Pastrana, Esq.
State Bar No. 1088286
Nelson W. Phillips III
State Bar No. 1028189
MWH Law Group LLP
735 N. Water Street, Suite 610
Milwaukee, WI 53202
Telephone: (414) 436-0353
Facsimile: (414) 436-0354
Email: carlos.pastrana@mwhlawgroup.com
Email: nelson.phillips@mwhlawgroup.com

ATTORNEYS FOR PLAINTIFF
Symbology Innovations LLC

By: /s/ Neil J. McNabnay
Neil J. McNabnay
mcnabnay@fr.com
Texas Bar No. 24002583
Ricardo J. Bonilla
rbonilla@fr.com
Texas Bar No. 24082704
Theresa M. Dawson
tdawson@fr.com
Texas Bar No. 24065128

FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, Texas 75201
Tel: (214) 747-5070
Fax: (214) 747-2091

COUNSEL FOR DEFENDANT
Briggs & Stratton Corporation

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 9th day of August, 2017.

/s/ Eugenio J. Torres-Oyola
Eugenio J. Torres Oyola